April 12, 2013

Office of the Secretary
Federal Communications Commission
445 12th St SW
Washington D.C. 20554

RE: WT Docket No. 01-289, FCC 13-2

Dear Secretary Dortch,

As a member of AOPA, I have been asked to comment on the proposed ban on 121.5 MHz Emergency Locator Transmitters, an action that the AOPA is opposed to. I wanted you to know that in this matter I do not support their recommendation. I believe the ban is justified. As a private pilot and a member of local SAR efforts, I can tell you that the 406 MHz beacon is much more effective at saving lives. For example, the 406 MHz beacon is more powerful – 5000 mW vs. 50 mW to 400 mW for the 121.5 beacon – which makes the likelihood of being detected more certain. The USCG reports being able to routinely pick up 406 MHz beacons at 100 miles or more, yet the low power 121.5 beacon can be hard to detect unless one is close, especially if the beacon is 50 mW. The 406 beacon works anywhere on the globe thanks to COSPAS-SARSAT, whereas the 121.5 beacon only works if there is a nearby ground station or aircraft and only if the ground station or aircraft is listening on the 121.5 MHz frequency. Finally, because the 406 MHz beacon is digital and not analog like the 121.5 MHz beacon, vital information such as aircraft tail number, GPS location, and emergency points of contact (assuming the beacon is registered) make the job of search and rescue faster, more efficient, and much more effective.

Because the 406 MHz beacon is more reliable, works globally, and provides time-critical data to rescuers, I believe it is time to gradually phase out the 121.5 beacon like the USCG did six years ago. Current street prices for the 406 MHz ELT are as low as $600, which makes the cost difference between the 406 and the 121.5 $400, about the cost of two tanks of gas. I think the benefit of 5W, digital, COSPAS-SARST 406 beacons outweighs the cost, even if it means just one more life is saved.

Sincerely,

Laurence Gilliam
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